I would like to go on record as opposing granting the petition RM-10521.

Stating his opinion that to allow "visiting/transient/tourist non-amateur non-United States resident foreign nationals" operation on channels designated for licensed use only, is tantamount to usurping FCC authority by allowing other nations' citizens to exercise their rights without regard for our existing laws. Since the frequency 446.0 MHz is designated as an American national simplex calling frequency, and the proposal for "unlicensed access to certain frequencies between 446.0 and 446.1 MHz" is considered "essentially unenforceable" by the proponent, such is not only an incorrect and erroneous assumption, it is a duplicitous and wasteful use of available resources (frequency spectrum & bandwidth).

Existing non-licensed services such as FRS (Family Radio Service) are readily available to those desiring to use radio communication methods. There is no necessity to permit operation at up to 0.5 W PEP or any unlicensed output on the proposed frequencies.

The US government radiolocation services are primary and Amateur Radio is secondary on that portion of the 70-cm band. The ARRL band plan for 70 cm designates 446.0 MHz as a national calling channel. Other frequencies in the segment are for simplex or repeater use.

Current use of that portion of the 70cm spectrum are well used by properly licensed individuals, and reallocation of that resource to non-licensed ultra-low power use would not create harmonious international relations as is suggested by the proponent Michael Trahos, KB4PGC.

Further, assuming such unlicensed transmission(s) by visitors to the United States on those channels or frequencies exists, the proponent's assertion that such activity is "essentially unenforceable" is wholly incorrect and ludicrous. It is prima facie evidence that the proponent appears to think the FCC is without enforcement ability, and does not care to prosecute violators of communication law.

I request that the Commission deny the proponent's motion RM-10521.

Submitted by Kevin L. Bardon, KG4RCP.